

First Assembly of God/fil/orship Center

130 W. Carpenter Street Springfield, iL 62702 (217)522-5632

Subject: Revised Petition for Exemption from Closed Captioning Requirements

Reference: CGB-CC-0055

introduction:

Living With Power is a weekly religious television program produced by First Assembly of God, currently being renamed iWorship Center. It is filmed live and then broadcasted locally over the following week to FOX, NBC, and Insight Cable Access 4. It is broadcast nationally on the SkyAngel network weekly as well. Each episode of Living With Power is produced in two versions: a 30-minute program and a 60-minute program. Its primary content is sermons taped live on Sunday mornings.

Nature and cost of the closed captions:

To send out for captioning: Closed Captioning Services (CPC) provides both captioning equipment and captioning services. To send the tapes to CPC for captioning each week would cost a \$150 setup fee, \$300 for our hour long program, and \$150 for our half our program(attachment 1). This would total \$600 per week. Our local NBC station (WANDTV) offered a special rate to temporarily close caption our program for \$100 per hour. The cost is normally \$200 per hour of captioning (attachment 2). Tapes captioned at WAND would need to then be sent to the other networks for airing. In addition to high expense, captioning would also create a delay in the airing of Living With Power, due to the added step of sending the tapes out for captioning.

To provide closed captioning in-house: In speaking with other closed captioners, it was recommended that CPC is the best solution to meet our captioning needs. The total price for equipment needed would be a minimum of \$4,295 (attachment 3). There would also need to be additional equipment to caption properly without loosing a generation.

When subtitling and open captioning were researched, it was found that the same program would need to be bought as with closed captioning. Neither open captions nor subtitles are viable alternatives for us. If we were to produce Living With Power using open captions or subtitles, the burden would be the same. Another option considered was too add a sign language interpreter to the screen of the program, but upon studying found that this is not considered an acceptable alternative.

impact on the operation of the program owner:

Current Living With Power expenses total \$574.80 per week, or almost \$30,000 per year (attachment 4). To add closed captioning to the program, we would either need to pay a captioning agency \$150 - \$600 per week or purchase expensive equipment that is not in the budget. If funds were found to purchase equipment, there is still the need for a person to caption every week. Note that our program director/producer works sixteen unbilled hours every week. We are not able to find someone with the skills and time to produce closed captions or subtitles, nor pay them appropriately.

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Financial resources of the program owner.

Living With Power is purely an expense of First Assembly of God/iWorship Center; it generates no income. Attached is the 2005 financial report for First Assembly of God/iWorship Center (attachment 5). Most equipment has been donated over the years; we have not found anyone able to donate captioning equipment.

Type of operations of the program owner:

First Assembly of God/IWorship Center is an Assemblies of God church and Living With Power is one of its ministries. It is a not for profit organization and its primary operations are caring for the Church Body and community, saving souls, and training disciples. Living With Power is one of the many ministries out of this church.

Other relevant factors:

Living With Power is produced and edited by volunteers. Though their service and time are indispensable to us, they are not able to add the burden of closed captioning efforts, whether done in-house or sent to a captioning agency.

Conclusion:

First Assembly of God/iWorship Center eagerly desires to comply with the closed captioning standards set forth by the FCC. Various methods of fulfilling this requirement have been researched and evaluated. However, all avenues explored are a great burden to the program owner. The financial burden exceeds what funds are available to be allotted to Living With Power and the efforts required are more than can be met. Though we greatly aspire to add closed captioning to Living With Power in the future, to do so at this time would cause undue burden. Therefore, First Assembly of God/iWorship Center requests to be permitted exemption to closed captioning for Living With Power.

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General Afidavit

State of Illinois
County of Sangamon

Before me, the undersigned Notary, Susan Burkholder, on this twelfth day of February, 2006, personally appeared Rachel Herrin, known to me to be a credible person and of lawful age, who being by me first duly sworn, on her oath, deposes and says:

I, Rachel Herrin, do swear that the facts stated in the previous filings dated November 15, 2005 and in current filings, dated February 12, 2006, under case identifier CGB-CC-0055 to be true and lawful to the best of my knowledge.

Rachel B. Herrin

Chief Operations Officer

Subscribed and sworn to before me, this twelfth day of February, 2006.

Súsan Burkholder

NOTARY PUBLIC

My commission expires: August 6, 2009.





Closed Captioning Services

Computer Prompting & Captioning Co.

Captioning & Subtitling Services

Post-Production

Video Formats

- Videotape: All formats from VHS to Digital Betacam
- DVD: Caption and subtitle files for most major DVD authoring systems
- Webcast: Video-on-Demand

Top quality captioning is our highest priority. It is achieved by:

- State-of-the-art software
- Experienced, highly trained captioners
- Teamwork of captioners & in-house software developers
- 16 years of experience
- Triple quality control

Satisfaction Guarantee

CPC provides a free approval copy to guarantee satisfaction

Specials

- Major discounts for bulk work
- Large discounts to caption Webcasts or DVDs of previously captioned videos

Transcription & Translation

Professional transcription and translation of most languages available at competitive prices

Languages

- Closed & open captioning: English, Spanish, French, Portuguese, Dutch, German and Italian
- Subtitling: English, plus all Eastern and Western European languages

Realtime Captioning

Video Formats

- Broadcasts: All formats
- Webcasts: Live Webcast Captioning with Windows Media Encoder and Real Helix Producer

Excellent Captioners

CPC employs only the highest qualified realtime stenotypists, with average accuracy rates of 98%

Audio Description

An audio description of the action on a videotape (analog or digital) is inserted on the videotape where applicable. The description is used by the blind and visually impaired

A Certified 8(a) Company

Post-Production Captioning

Pop-on mode:

\$7/minute

Roll-up mode:

\$5/minute

Transcription:

\$3/minute

There is a \$150 setup fee for professional video formats (BetaSP, Digital Betacam, etc.)

Bulk Rates for VHS

For any VHS job totaling over 5 hours, CPC has a great price of \$5.00 per minute of video, including transcription. You provide the video, we transcribe and caption it in the Roll-up mode.

Realtime Captioning

Broadcast & Webcast Captioning

Captioning setup fee

\$50 \$35

 Captioning each 15 minute segment of live event*

Realtime Webcast Hosting

· Web hosting setup fee

\$50

 Streaming video at 150. kbps per viewer per minute

\$0.10

* If the event contains a significant amount of technical terms, there will be a surcharge of up to 30%.

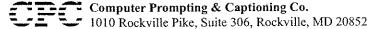
Audio Description

Audio file preparation, narration, and insertion of audio description onto the video (minimum 10 minutes)

\$35/minute

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GSA Schedule #GS-35F-4672G



Computer Prompting & Captioning Co.

800-977-6678

301-738-8487

info@cpcweb.com www.cpcweb.com

----Original Message-----From: Tracey Cole

Sent: Thursday, November 03, 2005 3:17 PM

To: Denise Daniels; Mike Johnston; Rob Comerford; Susan Aubert; Yvonne Stroud

Subject: Closed captioning

After talking to Mike and Denise we have agreed to provide a temporary solution for closed captioning our current religious programs.

If the churches agree to the following this would take effect Monday December

26th 2005.

- 1. The church will have to transcribe their show for us.
- 2. They will have to e-mail the transcription to us no later than the Wednesday before the air date
- 3. The program will have to be in house no later than the Wednesday before the air date
- 4. We will feed the transcription into news star and add the captioning through studio control
- 5. There will be a fee of \$50 per half hour and \$100 per hour show (regular studio control charge is \$200 per hour 1 hour minimum)

(the above fees will remain in effect for a 6 month period, after 6 months the client will be responsible for securing a captioning service or device, if WAND continues to close caption the program after this 6 month period the fee will revert to our regular studio control charge of \$200 per hour)

Again, I want to reserve this as a last option. Please let me know if you have any questions.

Thanks TC

Tracey Cole
Program Manager
WANDTV

Main Identity

From:

"Sidney Hoffman" <shoffman@cpcweb.com>

To:

<coo@iworshipcenter.org>

Sent:

Tuesday, January 10, 2006 4:07 PM

Subject:

CPC-600 Captioning

Rachel

To meet your captioning needs you need:

CPC-600 \$2,995

Link PCE-845D encoder \$1,200

Option: \$75 for video capture device

Shipping \$25 UPS ground

Sidney Hoffman

M.A. Computer Systems, M.S. Audiology

Licensed Teacher of the Speech and Hearing Handicapped

CPC

1010 Rockville Pike, Suite 306

Rockville, MD 20852

Toll Free: 1800 9-PROMPT

Local: (301) 738-8487 Fax: (301) 738-8488

TTY: (301) 738-8489

http://www.cpcweb.com

Main Identity

From:

"Burkholder, Craig" < Craig. Burkholder@st-johns.org>

To:

<info@iWorshipCenter.org>

Sent:

Thursday, November 10, 2005 1:15 PM

Subject:

expenses for Living With Power

Rachel

Here you go this is weekly

WE put out four programs a week, the master is on computer, so the way we are set up we would have to script each tape we do per week. This is with what equipment we have now.

Cost is: For tapes is \$74.80 each week We have four programs

Wand17

Air time is Fox55 \$350.00 a week \$150.00 a week

Skyangel

\$00.00 a week

Access 4

\$00.00 a week

Total

\$500.00 a week \

\$574.80/week = \$29,889.60/year

Time given each week for program around 16hr not billed.

WE just don't have the man power to do this at this time, but we will some day.

Hope this helps

Thanks Craig Burkholder Director/Producer Living With Power

2005 FINANCIAL REPORT

<u>Income</u>

Building	270,411
Missions	23,180
Other	42,906
Tithe	504,045

Total Income 840,542

Expense

Advertising	28,915
Audio & Video	6,625
Automobile	9,560
Bank Charges	2,131
Building Expenses	10,518
Building Fund	269,533
Church Planting	5,004
Computer Equipment & Maintenance	7,409
Contribution & Benevolent offerings	15,493
Dues & Subscriptions	3,734
Encounters	17,565
Equipment Rental & Repairs	1,502
Guest Speakers/Events	11,903
Hosting Events/Accommodations	12,740
Insurances	27,415
Miscellaneous	6,667
Missions	29,948
Music/Instruments	1,014
Payroll	259,939
Postage & Delivery	3,370
Printing & Reproduction	12,940
Professional Services Fees	970

Total Expense		844,241
Utilities		38,628
Taxes		22,674
Total Supplies		6,657
Supplies - Other	749	
Office	4,170	
Books & Materials '	1,738	
Supplies		
Seminars & Meetings		752
Total Program Expense		30,635
The Force	7,099	
Sisterhood	2,621	
Seniors	2,004	
School of Leaders	6,820	
Royal Rangers	218	
Nursery	1,781	
Missionettes	1,840	
MCCI	882	
KidZone	5,905	
IronMan .	1,465	
Program Expense		

Total Income	840,542	Year End Checking Account Balance	
Total Expense	844,241		\$ 125,042
Net Income -3699	-3699	Building Fund Balance	\$ 149,683
		Year End Closing Cash	\$ 274,725